

WOODLAWN LANDFILL
ADMINISTRATIVE RECORD FILE *
FOR THE UNILATERAL ADMINISTRATIVE ORDER
INDEX OF DOCUMENTS

1. Report: Proposed Plan Woodlawn Landfill Superfund Site, 5/26/94. P. 1-22.
2. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Jonathan P. Deason, United States Department of the Interior (DOI), re: Notification that pursuant to the EPA's request DOI has prepared a Preliminary Natural Resources Survey (PNRS) for the site, 7/19/93. P. 23-33. The technical analysis of the site is attached.
3. Letter to Ms. Debra Rossi, U.S. EPA, from Mr. Sean P. Morrison, National Oceanic and Atmospheric Administration (NOAA), re: NOAA's comments on the Record of Decision (ROD), 7/21/93. P. 34-34.
4. Letter to Ms. Debra Rossi and Ms. Terri White, U.S. EPA, from Ms. Deborah E. Jennings and Mr. William W. Toole, Piper & Marbury, re: Air Products and Chemicals and the BOC Group's submittal of comments on the Remedial Investigation/Feasibility Study (RI/FS) and the Proposed Remedial Action Plan, 7/23/93. P. 35-57. An Affidavit of Barry G. Belfield and the Preliminary Assessment and Site Evaluation for the Woodlawn Transfer Station are attached.
5. Letter to Ms. Debra Rossi, and Ms. Terri White, U.S. EPA, from Ms. Victoria H. Roberts, Rawle and Henderson, re: Comments on the Proposed Remedial Action Plan to be included in the ROD for the site, 7/23/93. P. 58-59.
6. Record of Decision, Woodlawn Landfill Site, 9/28/93. P. 60-178.
7. Letter to Ms. Debra Rossi, U.S. EPA, from Mr. George B. Markert, Bridgestone/Firestone, Inc., re: Comments and concerns on the ROD, 11/23/93. P. 179-219. The following are attached:
 - a) Exhibit A, Table 3- Predicted Leachate Concentration of Constituents in Site Ground Water From Subsurface Soils;

* Administrative Record File available 12/12/94.

- b) Exhibit B, Table 4- Toxicity Values for Chemicals of Potential Concern;
 - c) Exhibit C, a narrative explanation and a graph entitled, Maximum Vinyl Chloride Concentration;
 - d) Exhibit D, a table entitled Dermal Contact with Chemical Constituents in Groundwater while Showering; a table entitled Ingestion of Chemical Constituents in Groundwater; and a table entitled Inhalation of Volatilized Groundwater Constituents During Showering;
 - g) Exhibit E, Table 6-2- Background Metal Concentrations in Groundwater;
 - h) Exhibit F, Table 6-34- Comparison of Creek sediment Constituent Concentrations with Sediment Quality Criteria;
 - i) Exhibit G, Ecological Risk Characterization;
 - j) Exhibit H, a memorandum regarding Bog Turtle Habitat on the Bridgestone/Firestone Inc. Cecil County Maryland Site, dated November 12, 1993;
 - k) Exhibit I, the professional qualifications of David W. Grossmueller;
8. Memorandum to Ms. Debbi Rossi, U.S. EPA, from Ms. Pat Hilsinger, U.S. EPA, re: Letters sent to PRP's encouraging them to consider the use of an Alternative Dispute Resolution professional to assist in their cost allocation discussions, 12/14/93. P. 220-226. A copy of the letter to PRP's, a list of the Representatives of Potentially Responsible Parties, and a modified letter to the Department of the Navy are attached.
9. Letter to Mr. George B. Markert, Bridgestone/Firestone Inc., from Ms. Debra Rossi, U.S. EPA, re: EPA's response to Bridgestone/Firestone Inc.'s and Cecil County's comments on the ROD, 1/21/94. P. 227-236. A letter dated January 13, 1994, regarding DOI's response to Bridgestone/Firestone Inc.'s November 13, 1993 comments on the ROD is attached.
10. Letter to Ms. Pamela Marks, Office of the Attorney

General, from Ms. Debra Rossi, U.S. EPA, re: Notification that in the near future EPA intends to begin negotiations with PRPs for performance of Remedial Design and Remedial Action at the site, 2/3/94. P. 237-237.

11. Letter to Mr. Anthony R. Conte and Mr. Don Henne, DOI, from Ms. Debra Rossi, U.S. EPA, re: Negotiations concerning actions to be taken in response to a release or a threatened release of hazardous substances at the site, 2/4/94. P. 238-240.
12. Letter to Ms. Kirsten L. Erickson, NOAA, from Ms. Debra Rossi, U.S. EPA, re: Negotiations concerning actions to be taken in response to a release or a threatened release of hazardous substances at the site, 2/4/94. P. 241-243.
13. Letter to Mr. Harold Wagner, Air Products & Chemicals Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 244-250. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
14. Letter to Mr. Angelo N. Tarallo, The BOC Group Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 251-257. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
15. Letter to Mr. Masatoshi Ono, Bridgestone/Firestone Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 258-264. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
16. Letter to Mr. W. Edwin Cole, Cecil County, from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 265-271. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.

17. Letter to Mr. Charles H. Shivery, Elkton Sparkler Company Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 272-278. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
18. Letter to Mr. A. William Reynolds, GenCorp Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 279-285. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
19. Letter to Mr. Robert Hooper, Harford Sanitation Services Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 286-292. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
20. Letter to Mr. William R. Holland, United Dominion Industries Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action/demand for payment of costs, 3/4/94. P. 293-299. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
21. Letter to Mr. Frank Peters, U.S. Department of Defense, from Mr. Abraham Ferdas, U.S. EPA, re: Special notice letter pertaining to negotiations for remedial design and remedial action and demand for payment of costs pursuant to section 107(a) of CERCLA, 3/4/94. P. 300-306. A list of Woodlawn Landfill PRPs to whom special notice letters have been sent is attached.
22. Letter to Ms. Debra Rossi, U.S. EPA, from Ms. Victoria H. Roberts, Rawle & Henderson, re: Reply to EPA's response concerning Bridgestone/Firestone Inc.'s November 23, 1993 comments on the ROD, 2/23/94. P. 307-323. The following are attached:

- a) Table I, Groundwater Cleanup Levels for

Contaminants with Carcinogenic Health Effects;

- b) a list of references;
 - c) Attachment 1, a table entitled Ingestion of Chemical Constituents in Groundwater; a table entitled Dermal Contact with Chemical Constituents in Groundwater While Showering; and a table entitled Inhalation of Volatilized Groundwater Constituents During Showering;
 - d) Attachment 2, Uncertainty about the Carcinogenic Potency of Arsenic;
 - e) Attachment 3, a letter regarding investigations of fish community in the Basin Run Creek watershed, dated December 14, 1993.
23. Letter to Ms. Debra Rossi, U.S. EPA, from Mr. Don Henne, DOI, re: Response to EPA's March 29, 1994 letter to DOI concerning the review of Rawle & Henderson's letter to the EPA on behalf of Bridgestone/Firestone Inc., 4/28/94. P. 324-325.
24. Letter to Mr. Abraham Ferdas, U.S. EPA, from Ms. Deborah E. Jennings, Piper and Marbury, re: Air Products Inc.'s and The BOC Group Inc.'s response to special notice letters, 5/10/94. P. 326-327.
25. Letter to Ms. Debra Rossi, U.S. EPA, from Ms. Victoria H. Roberts, Rawle & Henderson, re: Bridgestone/Firestone Inc.'s response to March 4, 1994 special notice letter, 5/9/94. P. 328-398. The following are attached:

Exhibit A

- a) a letter regarding comments on the ROD dated November 23, 1993;
- b) Table 3, Predicted Leachate Concentration of Constituents in Site Ground Water From Subsurface Soils;
- c) Table 4, Toxicity Values for Chemicals of Potential Concern;

- d) a graph entitled Maximum Vinyl Chloride Concentration;
- e) a table entitled Dermal Contact with Chemical Constituents in Groundwater while Showering;
- f) a table entitled Ingestion of Chemical Constituents in Groundwater;
- g) a table entitled Inhalation of Volatilized Groundwater Constituents During Showering;
- h) Table 6-2, Background Metal Concentrations in Groundwater;
- i) Table 6-34, Comparison of Creek sediment Constituent Concentrations with Sediment Quality Criteria;
- j) Ecological Risk Characterization;
- k) a memorandum regarding Bog Turtle Habitat, dated November 12, 1993;
- l) the professional qualifications of David W. Grossmueller;

Exhibit B

- m) a letter regarding the reply to EPA's response to Bridgestone/Firestone Inc.'s comments on the ROD dated February 23, 1994;
- n) Table I, Groundwater Cleanup Levels for Contaminants with Carcinogenic Health Effects;
- o) a list of references;
- p) Attachment 1, a table entitled Ingestion of Chemical Constituents in Groundwater; a table entitled Dermal Contact with Chemical Constituents in Groundwater While Showering; and a table entitled Inhalation of Volatilized Groundwater Constituents During Showering;
- q) Attachment 2, Uncertainty about the

Carcinogenic Potency of Arsenic;

- r) Attachment 3, a letter regarding investigations of fish community in the Basin Run Creek watershed, dated December 14, 1993;

Exhibit C

- s) a letter regarding mixed funding proposal negotiations between Bridgestone/Firestone Inc. and EPA for remediation at the site;

Exhibit D

- t) Woodlawn Landfill Remedial Design Proposal;

Exhibit E

- u) Exhibit E of the good faith offer, which is Bridgestone/Firestone Inc.'s comments on EPA's proposed consent decree for this site, is not included.

26. Letter to Ms. Patricia D. Hilsinger, U.S. EPA, from Mr. Kevin A. Gaynor, Vinson and Elkins, re: Cecil County's response to the special notice letter, 5/9/94. P. 399-446. The following are attached:

- a) Attachment 2, Residual VCM Results - Waste Treatment, dated September 23, 1977;
- b) Attachment 3, a letter regarding confirmation of approval to increase the Woodlawn Landfill Site capacity by raising the fill level 1.5 feet, dated December 23, 1980, and a table entitled Toxicity Results;
- c) Attachment 4, summary of November 4, 1980 meeting with Jim Rooney & Ken Benner from Perryville Sewage Treatment Plant, dated November 10, 1980;
- d) a letter regarding sludge testing results, dated November 8, 1977;
- e) Attachment 6, nine letters regarding plant

waste disposal at the site;

- f) Attachment 7, a letter regarding figures for average yearly tonnage accepted by Cecil County disposal sites;
 - g) Attachment 8, a letter regarding re-establishment of Woodlawn Landfill for disposal of Firestone's industrial waste, dated March 14, 1980;
 - h) Attachment 9, details of a conference with Fred Dierkes, dated March 5, 1994;
 - i) Attachment 10, an entry regarding plasticizers, from Concise Encyclopedia of Chemical Technology;
 - j) Attachment 11, Polymer Compounding - specifications on Kodaflex DOP Plasticizer;
 - k) Attachment 12, a letter regarding amounts of residual vinyl chloride monomer in finished PVC products, dated May 22, 1979.
27. Letter to Ms. Debra Rossi, U.S. EPA, from Mr. Patrick O. Cavanaugh, McCutchen, Doyle, Brown & Enerson, re: General Tire Inc.'s response to the March 4, 1994 special notice letter, 5/9/94. P. 447-455. The sworn statements of John Kroll and Ralph W. Myers are attached.
28. Letter to Ms. Patricia Hilsinger, U.S. EPA, from Mr. Michael C. Powell, Gordon, Feinblatt, et al., re: Harford Sanitation Inc.'s response to the special notice letter, 5/9/94. P. 456-457.
29. Letter to Ms. Debra Rossi, U.S. EPA, from Mr. Thomas Hoban, re: United Dominion Industries Inc.'s response to the March 4, 1994 special notice letter, 5/9/94. P. 458-459.
30. Letter to Ms. Patricia Hilsinger, U.S. EPA, from Mr. Daniel R. Dertke, U.S. Department of Justice (U.S. DOJ), re: Department of the Navy's response to the March 4, 1994 special notice letter, 5/9/94. P. 460-460.

31. Letter to Ms. Patricia Hilsinger, U.S. EPA, from Mr. Daniel R. Dertke, U.S. DOJ, re: Department of the Navy's supplemental information to their May 9, 1994 response to the special notice letter, 5/9/94. P. 461-461.
32. Letter to Ms. Patricia Hilsinger, U.S. EPA, from Mr. Thomas Hoban, re: Wiley Manufacturing's supplemental response to a good faith offer, 5/19/94. P. 462-465.
33. Facsimile letter to Woodlawn Landfill's PRP representatives, from Mr. Abraham Ferdas, U.S. EPA, re: Inadequate good faith offers from special notice letter recipients, 5/26/94. P. 466-467.
34. Letter to Ms. Victoria H. Roberts, Rawle & Henderson, from Ms. Patricia Hilsinger, U.S. EPA, re: Reasons for EPA's rejection of Bridgestone/Firestone Inc.'s good faith offer, 6/9/94. P. 468-469.
35. Letter to Mr. Richard W. Collins and Mr. Robert DeMarco, Maryland Department of the Environment, from Ms. Debra Rossi, U.S. EPA, re: Confirmation of meeting with Bridgestone/Firestone Inc. on July 13, 1994, 7/11/94. P. 470-470.
36. Letter to Ms. Patricia D. Hilsinger, U.S. EPA, from Mr. Thomas R. Bartman, Vinson & Elkins, re: An analysis of the likely origin of the manganese concentrations in groundwaters and soils at the site, 7/12/94. P. 471-475. The analysis is attached.
37. Handwritten Woodlawn Landfill meeting attendance record, 7/13/94. P. 476-476.
38. Letter to Mr. Richard W. Collins and Mr. Robert DeMarco, Maryland Department of the Environment, from Ms. Debra Rossi, U.S. EPA, re: Notification of the second Woodlawn Landfill consent decree negotiations session on August 3, 1994, 7/27/94. P. 477-477.
39. Letter to Ms. Wendy Koch, Rawle & Henderson, from Ms. Patricia D. Hilsinger, U.S. EPA, re: Notification that EPA is considering entering into settlements with PRPs other than Bridgestone/Firestone Inc., 7/28/94. P. 478-478.
40. Facsimile memorandum to Mr. Tom Bartman, from Ms. Debra Rossi, U.S. EPA, re: Risk-based concentration for

Manganese, 8/2/94. P. 479-485. The following are attached:

- a) a memorandum regarding Risk-based Concentration Table, third quarter 1994, dated July 11, 1994;
 - b) a table of Risk-Based concentrations, dated July 11, 1994;
 - c) a map entitled Groundwater Chemical Isopleths, Total Iron and Manganese;
 - d) a graph entitled Dissolved Mn vs. Redox Potential;
 - e) a graph entitled Dissolved Mn vs. pH.
41. Handwritten RD/RA consent decree negotiations meeting attendance record, 8/3/94. P. 486-486.
42. Memorandum to Ms. Debbie Rossi, U.S. EPA, from Ms. Pat Hilsinger, U.S. EPA, re: Need for a Unilateral Administrative Order for the Woodlawn Landfill Site, 10/11/94. P. 487-487.
43. Letter to Mr. Anthony Leonardo, Maryland Department of the Environment, from Ms. Debra Rossi, U.S. EPA, re: Notification that EPA intends to issue a CERCLA Section 106 Unilateral Order to Bridgestone/Firestone Inc. on or before November 30, 1994, 11/18/94. P. 488-488.
44. Letter to Mr. W. Edwin Cole Jr., The Board of County Commissioners for Cecil County, and Mr. Masatoshi Ono, Bridgestone/Firestone Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmitting a CERCLA Section 106 Unilateral Administrative Order for Remedial Design and Remedial Action at The Woodlawn Landfill Site in Colora, Maryland, 11/28/94. P. 489-685. The Order, Docket No. III-95-05-DC, dated November 25, 1994 is attached.